UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NAVIGATOR CAPITAL PARTNERS, L.P. on behalf of itself and all others similarly situated.

Plaintiff,

-against-

BEAR STEARNS ASSET MANAGEMENT INC., BEAR, STEARNS SECURITIES CORP., THE BEAR STEARNS COMPANIES INC., BEAR, STEARNS & CO. INC., RALPH CIOFFI, RAYMOND MCGARRIGAL, MATTHEW TANNIN, BARRY COHEN, GERALD CUMMINS, DAVID SANDELOVSKY, GREGORY QUENTAL, SCOTT LENNON, MICHELLE WILSON-CLARKE, AND WALKERS FUND SERVICES LIMITED,

Defendants,

-and-

follows:

BEAR STEARNS HIGH-GRADE STRUCTURED CREDIT STRATEGIES, L.P.,

Nominal Defendant.

USDC SDNY

No. 07 Civ. 07783 (AKH)

MOTION TO ADMIT MICHAEL A. COLLORA, MICHAEL B. GALVIN, **JUSTIN P. O'BRIEN AND** AMY B. AUTH AS **COUNSEL PRO HAC** VICE

(hereinafter referred to as the "Walkers' defendants") hereby seek to admit Michael A. Collora, Michael B. Galvin, Justin P. O'Brien and Amy B. Auth as counsel pro hac vice for them in the above action. In support of this motion, proposed counsel for the Walkers' defendants state as

Jettoec Dettoec Defendants Scott Lennon, Michelle Wilson-Clarke and Walkers Fund Services Limited

- Michael A. Collora, Michael B. Galvin, Justin P. O'Brien and Amy B. Auth were 1. admitted on August 25, 2008 Pro Hac Vice to represent, Scott Lennon, Michelle Wilson-Clarke and Walkers Fund Services Limited, in the matter, Geoffrey Varga, et al. v. The Bear Stearns Companies, Inc., et al., case number 08-cv-03397(AKH) (hereinafter referred to as "Varga").
 - 2. Both matters have a similar set of core facts and common defendants.
- 3. The Varga matter has been consolidated with the Navigator matter for purposes of discovery.
- 4. It would be efficient for the Walkers' defendants to have the same counsel in Navigator as in Varga.

WHEREFORE, Defendants Scott Lennon, Michelle Wilson-Clarke and Walkers Fund Services Limited, respectfully request this Court to issue an order granting the admission of Michael A. Collora, Michael B. Galvin, Justin P. O'Brien and Amy B. Auth Pro Hac Vice.

DATED: New York, New York September 8, 2008

> Respectfully submitted By Proposed Counsel for Scott Lennon, et al.,

Michael A. Collora (BBO No. 092940) Michael B. Galvin (BBO No. 630515) Justin P. O'Brien (BBO No. 658765) Amy B. Auth (BBO No. 654010) DWYER & COLLORA, LLP 600 Atlantic Avenue Boston, MA 02210

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Motion to Admit Michael A. Collora, Michael B. Galvin, Justin P. O'Brien and Amy B. Auth as Counsel Pro Hac Vice was served by hand or first class mail on September 8, 2008 upon counsel of record listed below.

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